

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

PARKER PELHAM, Individually and on Behalf  
of All Others Similarly Situated,

Case No. 1:23-cv-00162-CFC-SRF

Plaintiff,

v.

VBIT TECHNOLOGIES CORP., VBIT  
MINING LLC, ADVANCED MINING GROUP,  
DANH CONG VO a/k/a DON VO, PHUONG D  
VO a/k/a KATIE VO, SEAN TU, JIN GAO,  
LILLIAN ZHAO, and JOHN DOE  
INDIVIDUALS 1-10, and DOE COMPANIES 1-  
10,

Defendants.

**NOTICE OF MOTION FOR PARKER PELHAM'S APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL**

**TO: THE CLERK OF THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that lead plaintiff movant Parker Pelham (“Movant”) respectfully moves this Court for an order: (1) appointing Movant as Lead Plaintiffs pursuant to §21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); (2) approving Movant’s selection of Scott+Scott Attorneys at Law LLP as Lead Counsel and Christensen & Dougherty LLP as Liason Counsel for the Class; and (3) granting such other relief as the Court may deem just and proper.

This motion is based on this Notice and the Memorandum of Law filed herewith, the Declaration of Joseph L. Christensen in support thereof, including Exhibits A-D, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

DATED: April 17, 2023

**CHRISTENSEN & DOUGHERTY LLP**

s/ Joseph L. Christensen

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*Counsel for Proposed Lead Plaintiff Parker Pelham*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 17, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

*s/ Joseph L. Christensen*  
Joseph L. Christensen